



## **Process and Procedures for Title III Immigrant and Title III LEP**

### **Activities for Allowed or Unallowed Activities/Expenses and Costs:**

**Process:** The Grants Director, Assistant Superintendent, Director of Instructional Support, Stakeholders and Business Manager establish the budget for the program based on the district and school's academic needs (data driven) and set aside/distribution regulations. The accounting/grant compliance offices monitor actual expenditures closely on a regular/monthly basis and ensure that they are properly recorded, are approved by the state, and noted in the consolidated grant. The Director of Instructional Support and Business Office ensures that all employees that are charged to the grant have the necessary documentation to support the allocation.

**Control:** The Director of Instructional and selected stakeholders review allocation and the district CNA to determine student needs and then establish a budget along with narratives. The Grant Director /accounting office review the budget/narratives to ensure that they meet the allowable use of funds criteria and ensure that they are coded to the correct account number. The compliance office and program director closely monitor the activities applied to the grant to ensure all the goals and program requirements are being met. The accounting office monitors the expenditures applied to the grant to ensure they are within the approved budget allocation. The senior accountant also reviews the general ledger detail when making the requests for program funds to ensure they are within the grant period, are allowable, and follow the consolidated grant.

### **Eligibility:**

**Process:** The district offers services to students under the guidelines of Title III. Students are selected across grade levels and subject areas defined by needs, school improvement, and formal and informal testing data following State and local qualifying expectations.

**Control:** The Director of Grants completes the application and ensures that eligibility reports are properly completed and submitted to the State. Following this will be continuous monitoring by the business manager, Director of Grants to ensure eligibility requirements are met.

### **Equipment and Property Management:**

**Process:** All equipment purchases are properly reported/accounted for within the approved budget and tagged. The grant and technology departments maintain a log of assets purchased with Title III funds and closely monitor the location of such equipment as appropriate. The school buildings also maintain a log of equipment purchased with building-level federal funds. Any proceeds received from the disposal of the equipment will be returned to the grantor if applicable.

**Control:** If applicable, the Directors of Grants and Technology will maintain a log of the tag equipment and/or real property records for reporting. They will also ensure that equipment is adequately safeguarded and tracked to ensure proper identification. Upon disposal or breakage, the Director of Technology will notify the accounting department. The district is responsible for returning any proceeds to the grantor if applicable.

### **Matching, Level of Effort, Earmarking:**

**Process:** Any planned changes from year to year in the utilization of Title III funds are carefully reviewed by the Director of Grants and accounting office to ensure that the District is not supplanting general fund expenditures. In addition, the district ensures that funds that are earmarked for certain programs are identified in the budget and accounted for separately.

**Control:** Significant planned changes in utilization of Title III funds are discussed with the District's MDE Title III Field Services representative prior to implementation.

### **Period of Availability of Federal Funds:**

**Process:** Once the district submits the application for the Title III funds, they will receive the approval letter from the MDE outlining the period of availability. The Grant Director ensure all expenditures are within the grant period. Any expenses applied to the grant that do not fall within the allowable program period will be immediately adjusted for. The review of expenses applied to the program, to ensure they are within the availability of the program, is done during the monthly request for federal funding.

**Control:** The Grant Director and accountant review grant expenditures for proper cut-off and

documents this procedure through the accrual process at year-end, as well as the monthly request of federal funding. This review is documented by the accountant as part of the month end close out procedures.

**Special tests and Provisions:**

**Process:** As noted above this requirement varies depending upon program assurances. However, many of the procedures require monitoring and complying with program requirements. For example, the District receives notification of their award and meets with compliance and the program director to determine budget within their allocation. Also, private school notices are sent out to notify them that they are eligible to receive services following the Kent County model and necessary local contacts.

**Control:** The client controls are that there are several stakeholders and departments working together to ensure all requirements and compliance measures are met. For instance, for Title III Director, program director and human resources review applicants so that all educational employees are highly qualified upon being hired as an employee. The compliance office monitors if any private schools start up to ensure they are notified about receiving services.

**Completion of Michigan Department of Education and Federal Reporting**

**Process:** District receiving Title III Immigrant and/or Title III LEP are required by the US ED to complete:

- Template for Alternative Language Program Provided to English Learners in MEGS+
- Annual Title III Program Evaluation

**Control:** The program director completes the required documents with collaboration from the Grant Director, reviews documents and shares necessary revisions with program director and other necessary staff. Grant Compliance officer submits Wyoming Public School District approved documents to MDE.